

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: MARCUS G. CROZIER

Bankruptcy No. 25-01770-JAW

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

COMES NOW, Family Choice Financial, Inc. - Canton Branch (“Family Choice”) by and through its attorney of record and files this, its Objection to Confirmation of Chapter 13 Plan as to the Creditor’s treatment for the purpose of plan confirmation and would respectfully show unto the Court, as follows:

1. On or about July 21, 2025, Debtor filed a petition for bankruptcy pursuant to Chapter 13 of the United States Bankruptcy Code. As of the date of filing, Debtor is indebted to Family Choice in the sum of \$2,982.54 on Account #3164, plus interest accruing thereafter, late fees, attorney’s fees, and other expenses.

2. Family Choice’s claim is secured by property contained in the duly perfected UCC financing statement which was filed by Family. A copy of the documentation evidencing Family Choice’s lien is attached hereto and made apart of the same as if copied in full herein. The value of the collateral securing the debt is not less than \$8,300.00 which exceeds the proposed value under the Plan and makes Family Choice fully secured.

3. Family Choice denies that all the collateral is exempt as listed in the proposed plan and objects to Debtor’s claim of exemption for that property which is not exempt pursuant to Miss Code Ann. § 85-3-1, et seq. or other applicable law. Family Choice denies that the lien on Debtor’s property impairs all exemptions to which debtor would be entitled under 11 U.S.C. § 522(b).

4. To the extent that Family Choice is not paid the replacement value of its collateral with interest, Family Choice rejects debtor’s plan.

5. Debtor's Chapter 13 Plan proposes to surrender the "household goods" to Family Choice. Family Choice does not necessarily oppose the surrender of the collateral. However, Family Choice would hereby request an opportunity to view and examine the collateral prior to a hearing on this matter.

6. In addition, the Plan filed by Debtor fails to list and propose treatment as to the 1994 Honda 4-wheeler which secures the loan with Family Choice and is listed on the contract and property contained in the duly perfected UCC financing statement which was filed by Family Choice.

7. Family Choice further objects to any amended and/or altered plan that has been or may be filed in this case.

8. And for other grounds to be shown at hearing hereof.

WHEREFORE, PREMISES CONSIDERED, Family Choice requests that this Court to deny confirmation of Debtor's proposed plan and treatment and that Family Choice Financial, Inc. - Canton Branch be paid in full at a rate according to the proper valuation and for other relief as is good and equitable and grant such other relief as is necessary under the circumstances.

Dated: August 8, 2025

Family Choice Financial, Inc. - Canton Branch

BY: /s/ B. Joey Hood, II
B. Joey Hood, II - Its Attorney

B. Joey Hood, II
Attorney at Law, PLLC
Post Office Box 759
Ackerman, MS 39735
Telephone (662) 285-4663
notices@jhoodlaw.com
MBN: 101147

CERTIFICATE OF SERVICE

I, B. Joey Hood, II, attorney for Family Choice Financial, Inc. - Canton Branch, do hereby certify that the following have been served electronically via ECF with a copy of this objection to confirmation.

- | | | |
|----|--------------------------|--------------------------------------|
| 1. | Thomas Carl Rollins, Jr. | trollins@therollinslawfirm.com |
| 2. | U.S. Trustee | <u>USTPRegion05.JA.ECF@usdoj.gov</u> |
| 3. | Torri Parker Martin | tpm@tpmartinch13.com |

Date: August 8, 2025

/s/B. Joey Hood, II
B. Joey Hood, II

B. Joey Hood, II
Attorney at Law, PLLC
Post Office Box 759
Ackerman, MS 39735
Telephone (662) 285-4663
notices@jhoodlaw.com
MBN: 101147